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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
CONSTELLATION COMMUNICATIONS, INC.	)	RM-7771
	)	
Amendment of Parts 2 and 25 of the	)	
Commission's Rules to Implement LEO	)	
Satellite Systems in the RDSS Bands	)	
and Grant a Pioneer's Preference	)	
	)	
Petition of TRW, Inc. for Amendment of	)	RM-7773
Sections 2.106 and 25.141 of the	)	
Commission's Rules to Allocate	)	
Spectrum for, and to Establish Other	)	
Rules and Policies Pertaining to,	)	
Satellite Systems in the RDSS Bands	)	
	)	
Petition for Rulemaking of Ellipsat	)	RM-7805
Corporation to Amend Sections 2.106,	)	
25.141 and 25.201 of the Commission's	)	
Rules	)	
	)	
Petition of American Mobile Satellite	)	RM-7806
Corporation for Amendment of Parts 2,	)	
22 and 25 of the Commission's Rules	)	
to Allocate Spectrum for the Mobile	)	
Satellite Service.	)	

REPLY COMMENTS OF  
COMMUNICATIONS SATELLITE CORPORATION

Communications Satellite Corporation (COMSAT) hereby submits the following reply to the comments submitted in response to the above petitions for rulemaking requesting reallocation of a portion of the radiodetermination satellite service (RDSS) band for use by the Mobile-Satellite Service (MSS).

COMSAT remains convinced that a comprehensive rulemaking, rather than a limited spectrum allocation proceeding, is the most efficient way to process and consider the various low earth orbit (LEO) and geostationary (GSO) satellite proposals for the RDSS

bands. Indeed, the Commission, by placing the applications of TRW, Constellation, Loral, AMSC, and Ellipsat on public notice,<sup>1</sup> has increased the need for a single proceeding to address the substantial technical, service, and licensing issues these system proposals raise. The suggestions of some of the commenters for streamlined rulemaking, parallel processing, and reliance on the waiver process are unrealistic given the complexity of the issues the Commission must decide.<sup>2</sup> Technical, service, and licensing issues should not be decided in a piecemeal fashion. COMSAT maintains that it is more efficient in the long run to conduct a comprehensive rulemaking now rather to hinder the development of the band later through ad hoc decision making.

COMSAT also reiterates its belief that the Commission should postpone any allocations rulemaking until the conclusion of the WARC-92 Conference. Reopening the debate regarding the use of the RDSS bands at this juncture could seriously undermine U.S. efforts at WARC-92. The Commission should follow its traditional course of action and address the LEO spectrum issues in the context of a domestic proceeding which takes into account the final decisions of the Conference. In the interim, the Commission could establish guidelines on the technical and operational flexibility possible within the proposed bands (consistent the U.S. proposals to WARC-

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<sup>1</sup> See Public Notice, Report No. DS-1134, Oct. 24, 1991.

<sup>2</sup> See e.g., Comments of Loral Qualcomm Satellite Services, Inc., RM 7771, 7773, 7806, 7805, Oct. 16, 1991 at 8-9; Comments of Motorola Communications, Inc., RM 7771, 7773, 7806, 7805, Oct. 16, 1991.

92) and resolve what appears to be numerous and possibly conflicting differences among the applicants' proposed use of the RDSS bands. Taking such action now would enable the Commission to act quickly once the final decisions of Conference are issued.

Respectfully submitted,

COMMUNICATIONS SATELLITE CORPORATION

  
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November 14, 1991

CERTIFICATE OF SERVICE

I, Cheryl L. Schneider, hereby certify that the foregoing "Comments" was served by first-class mail, postage prepaid, this 14th day of November, 1991 on the following persons:

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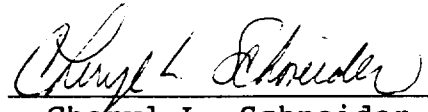
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